

FILED
CLERKS OFFICE

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

U.S. DISTRICT COURT
DISTRICT OF MASS.

FIELD STAFF EMPLOYEES UNION,

Plaintiff,

v.

AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO, COUNCIL 93,

Defendant

CIVIL ACTION NO:
04-10577-PBS

PARTIES' RULE 16.1(D) JOINT STATEMENT

A. Joint Discovery Plan

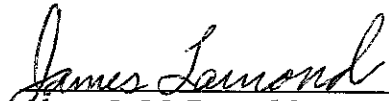
The parties do not believe that discovery will be necessary in this matter.

B. Motion Schedule

1. August 15, 2004 for plaintiff's motion for judgment on the pleadings or for summary judgment.
2. September 15, 2004 for defendant's opposition to same and/or for its motion for judgment on the pleadings or for summary judgment.
3. September 30, 2004 for any reply by plaintiff to defendant's opposition and/or opposition to defendant's dispositive motion.

For the plaintiff,

By its attorneys,

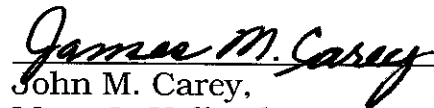


Alan J. McDonald
James F. Lamond
McDonald & Associates
153 Cordaville Road, Suite 210
Southborough, MA 01772

Dated: June 4, 2004

For the defendant,

By its attorneys,



John M. Carey,
Mary Jo Hollender
Hollender & Carey, L.L.P.
44 School Street, Suite 415
Boston, MA 02108

Dated: June 4, 2004

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U.S. DISTRICT COURT
DISTRICT OF MASS.
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June 4, 2004

VIA MESSENGER

Tony Anastas, Clerk of Court
United States District Court
District of Massachusetts
1 Courthouse Way, Suite 2300
Boston, MA 02110

Re: Field Staff Employees Union
v. AFSCME, Council 93
USDC Civil Action 04-10577 PBS

Dear Mr. Anastas:

Enclosed for filing in the above-referenced matter, please find the Parties' Rule 16.1(D) Joint Statement.

Thank you.

Very truly yours,

James F. Lamond (JFL)
James F. Lamond

JFL/jg
cc: John Gordon, President
John M. Carey, Esq.